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Attorneys for Defendant

UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA

CATHY L. DIFRANCO,
Plaintiff,

v.

ANDREW SAUL,
Commissioner of Social Security,
Defendant.

Case No. 2:19-cv-00896-APG-VCF

**JOINT STIPUATION AND ORDER FOR
EXTENSION OF TIME TO RESPOND TO
PLAINTIFF'S MOTION FOR REVERSAL/
REMAND.**

(FIRST REQUEST)

IT IS HEREBY STIPULATED, by the parties, through their respective counsel of record, that the time for Defendant to respond to Plaintiff's Motion for Reversal/Remand be extended from October 10, 2019 to **November 14, 2019**.¹ This is Defendant's first request for extension. Good cause exists to grant Defendant's request for extension. Counsel for Defendant (Counsel) was out on family leave in late June and early July to take care of her elderly mother, who had two surgeries, and another major surgery in September 2019. In addition, Counsel also has over

¹ Counsel apologizes for the belated request but was out on sick leave on the date of the current filing deadline and filed her request as soon as reasonably practicable.

1 100+ active social security matters, which require two more dispositive motions until mid-November,
2 and three pending Ninth Circuit matters which require multiple levels of review. Due to unanticipated
3 leave and heavy caseload, Counsel needs additional time to adequately review the transcript and
4 properly respond to Plaintiff's Motion for Summary Judgment. The parties further stipulate that the
5 Court's Scheduling Order shall be modified accordingly. Defendant makes this request in good faith
6 with no intention to unduly delay the proceedings. Counsel apologizes for the belated request, but
7 made her request as soon as reasonably practicable following her leave.
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9 Respectfully submitted,

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11 Dated: October 11, 2019

/s/ David Chermol
(*as authorized by email on October 11, 2019)
DAVID CHERMOL
Attorney for Plaintiff

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14 Dated: October 11, 2019


NICHOLAS A. TRUTANICH
United States Attorney
DEBORAH LEE STACHEL
Regional Chief Counsel, Region IX
Social Security Administration

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18 By /s/ Tina L. Naicker
TINA L. NAICKER
Special Assistant U.S. Attorney
Attorneys for Defendant
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21 **[PROPOSED] ORDER**

22 **APPROVED AND SO ORDERED:**

23 10-23-2019
24 DATED: _____



THE HONORABLE CAM FERENBACH
UNITED STATES MAGISTRATE JUDGE
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1 **CERTIFICATE OF SERVICE**

2 I, TINA L. NAICKER, certify that the following individual was served with a copy of the
3 **JOINT STIPUATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO**
4 **RESPOND TO PLAINTIFF'S MOTION FOR REVERSAL/REMAND.**

on the date and via the method of service identified below:

5 **ECF Notice:**

6 David F. Chermol
7 Chermol & Fishman, LLC
8 11450 Bustelton Ave
9 Philadelphia, PA 19116
10 215-464-7200
11 Fax: 215-464-7224
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18 Email: haltaylorlawyer@gbis.com

Attorneys for Plaintiff

Respectfully submitted this 11th day of October 2019,

17 /s/ Tina L. Naicker
18 TINA L. NAICKER
19 Special Assistant United States Attorney
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